

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HANGZHOU CHIC INTELLIGENT)
TECHNOLOGY CO., LTD. and UNICORN)
GLOBAL, INC.,)
)
Plaintiffs,) Case No. 20-cv-4806
)
v.) Judge Thomas M. Durkin
) Magistrate Judge Jeffrey Cole
)
THE PARTNERSHIPS AND)
UNINCORPORATED ASSOCIATIONS)
IDENTIFIED ON SCHEDULE A,)
)
Defendants.)
)

JOINT STATUS REPORT

Plaintiffs Hangzhou Chic Intelligent Technology Co., Ltd (“Chic”) and Unicorn Global, Inc. (“Unicorn”) (“Plaintiffs”) file this Joint Status Report, as ordered by the Court (Dkt. 89), on behalf of all parties and eBay, Inc. The substantive¹ motions currently pending before the Court are as follows:

- Plaintiffs' Motion for Preliminary Injunction (Dkt. 80), as well as the related Plaintiffs' Motions to Seal (Dkt. 83) and for Leave to File an Oversized Brief (Dkt. 84)
- eBay, Inc.'s Motion to Stay the TRO (Dkt. 59)
- eBay, Inc.'s Motion to Dissolve the TRO (Dkt. 56)

As part of the continuing discussions between Plaintiffs and the parties and non-parties, Plaintiffs recently received discovery that may require Plaintiffs to withdraw the pending Motion for Preliminary Injunction (and related motions) and to seek leave to file a Third Amended

¹ This list does not include pending motions to appear pro hac vice (Dkt. 86–88, 90) and a pending motion to continue (Dkt. 91), all of which are unopposed.

Complaint. Specifically, discovery has raised questions as to whether venue is proper as to some of the Defendants, whom Plaintiffs contend they believed in good faith were based outside of the United States, but who may, in fact, be based in the United States, in districts outside of the Northern District of Illinois. Plaintiffs are expeditiously evaluating this discovery and the proper course of action in light of the new information.

As to eBay, Inc.'s motions, Plaintiffs and eBay, Inc. are continuing discussions and, without waiving any rights or arguments, Plaintiffs do not intend to enforce the TRO as to eBay, at least until after a hearing on a preliminary injunction motion has occurred.

Therefore, at this time, no ruling is necessary on the pending motions, and the motions may be resolved cooperatively, without Court action, within a few days. Plaintiffs will submit an additional Joint Status Report by November 4, 2020.

Date: October 28, 2020

Respectfully Submitted,

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